Remarks

The present response is filed with a Request for Continued Examination (RCE), and is to the Office Action mailed in the above-referenced case on November 7, 2003, made final. The Examiner has rejected claim 25 under 35 U.S.C. 112, second paragraph, as being indefinite due to informalities. Applicant herein corrects the antecedent basis by amendment for claim 25 to overcome the Examiner's objection.

Claims 16-27 are rejected under 35 U.S. C. 103(a) as being and that of over Wengrovitz (Application Pub. No. 2002/0110113), hereinafter Wengrovitz. Applicant has carefully studied the prior art presented by the Examiner, and the Examiner's rejections and statements of the instant Office Action. In response applicant herein provides argument that the prior art cited and applied by the Examiner in this case does not a obviate applicant's claims, and to establish that the claims in their present form clearly and unarguably distinguish applicant's invention over that of the prior art teachings. Applicant points out and argues the key limitations of applicant's independent claims, which the Examiner appears to misunderstand in his rejections and statements.

The Examiner has stated that, regarding independent claims 16 and 22, Wengrovitz teaches a system for routing a communication event in a call center having routing means provided by a CTI server, the event initiated by an originator at a computerized workstation outside the call center, comprising substantially all of the limitations of applicant's claims. The Examiner adds that, while Wengrovitz discloses the software-enabled SIP mechanism (e.g. emulation client) is coupled to the workstation (e.g. phone) via cables or other transmission media, it would have been obvious at the time of the invention to shift the location

of the SIP mechanism from the switch to the workstation (phone) absent a showing of unexpected results.

Applicant respectfully traverses the Examiner's interpretation of the teachings of Wengrovitz as teaching or suggesting all of the capabilities and limitations of applicant's invention and claims. Firstly, applicant must direct the Examiner's attention to applicant's independent claim 1, which specifically recites "a system for routing a communication event in a call center having routing provided by a CTI server,...". Applicant respectfully points out to the Examiner that Wengrovitz clearly fails to teach a routing means provided by a CTI server, fails to teach routing communication of events in a call center, and fails to teach any intelligent routing at all for that matter.

Specifically, referring now to Fig. 2 of Wengrovitz, and the supporting disclosure beginning column 2, paragraph 32, Wengrovitz teaches a data communication network supporting an emulation service for a SIP-compatible telephone initiating a call to a SIP compatible phone via the Internet. The emulation service is provided by emulation client 50a of switch 50, and translates an SIP message to a PBX message understandable by switch 50, or vice versa. Switch 50 is taught to be a standard private branch exchange (PBX) switch well-known in the art, which does not provide intelligent routing, as is provided by such as a CTI server of the communication center of applicant's invention.

Wengrovitz teaches using SIP protocol for practicing standard Internet telephony, but clearly does not teach sending routing requests, or any intelligent routing of events according to such requests provided by a CTI server of the communication center. Applicant's invention, on the other hand, teaches in a multi-media communication center, routing the communication events through intelligence provided by a CTI server of the communication center, characterized in that the re-formatting mechanism converts the SIP routing requests into the protocol understood by the CTI server. The clear and advantageous distinction of applicant's invention is providing the capability of sending a telephony event

along with a routing request in a different another protocol, as well as the ability at the routing destination of the routing event to interpret the event as being of SIP protocol, and then translating the event data into the data form recognizable by the CTI server, such that the CTI server can then provide and return an intelligent routing determination for the event of the SIP request, based on the routing rules established for the entire call center. An advantage is that the event itself (a telephone call) and the SIP routing request can be completely separate, and even delivered by entirely different means.

Further to the above, regarding the Examiner's statement that it would have been obvious at the time of the invention to shift the location of the SIP mechanism from the switch to the workstation (phone) absent a showing of unexpected results, applicant also respectfully traverses the Examiner's position, and points out that by simply shifting the SIP mechanism from the switch to the phone would not be obvious at the time because the unexpected result would be that the user still not be sending a routing request; rather, simply an event initiation, and further the user would not be able to add any additional data to the routing request, such as a textual reason for the requested contact.

For example, referring now to applicant's Fig. 4, a communication center 402 is illustrated for routing requests and events, initiated by remote user 419. User 419 has on the computer platform an instance of software (SW 420) for preparing and sending the SIP routing request along with the event initiation, and may be provided with applicable client software through download from such as Internet 418. User 419 further has the functionality of software application (FF 421) enabling the user to populate form information into the content of the SIP request, which causes the event request to be initiated having an SIP header and the completed form as the body of the SIP message. The SIP event then arrives at server 410 where SW 411 parses the message for content and separates the header information and content (form data) from the SIP message. The parsed data is

then re-formatted into the protocol understood by the CTI server, enhanced with T-server functionality for added routing intelligence and capability.

Applicant argues that, in shifting the location of the SIP mechanism of Wengrovitz simply from the switch to the telephone, Wengrovitz would still fail to teach or suggest or have motivation for sending or initiating SIP routing requests along with the event initiation, or re-formatting the SIP routing request into a protocol understood by a CTI server, the CTI server determining and returning the routing for the communication event, because Wengrovitz does not disclose routing SIP requests in a communication center and does not teach a CTI server in a communication center for providing the intelligent routing capability for the SIP routing requests.

As all of the claims standing for examination have been demonstrated to be patentable over the art of record, applicant respectfully requests reconsideration, and that the present case be passed quickly to issue. If there are any time extensions needed beyond any extension specifically requested with this amendment, such extension of time is hereby requested. If there are any fees due beyond any fees paid with this amendment, authorization is given to deduct such fees from deposit account 50-0534.

Respectfully Submitted,
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